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7 Attorneys for Plaintiffs
BROADCAST MUSIC, INC. et al.

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
11

12 BROADCAST MUSIC, INC. et al,
13 Plaintiffs,

14 v.

15 G&M GAME CORPORATION, KRAZY
16 KOYOTE BAR & GRILL, GEORGE D.
HEADLEY and MARCOS ANTHONY
17 HEADLEY, each individually,

18 Defendants.

No. C07-02453 CRB

Action Filed May 8, 2007

JOINT REQUEST FOR STAY OF
PROCEEDINGS

19 **JOINT STIPULATION FOR STAY OF PROCEEDINGS**

20 All parties to this action jointly request that the Court enter an order staying all further
21 proceedings in the litigation. Plaintiffs and Defendants have settled this matter in principle.
22 Based on this settlement in principle, further litigation could become unnecessary within a
23 relatively short period of time. In order to avoid the burden and potentially unnecessary
24 expense of litigating this action while settlement terms are finalized and performed, and in
25 order to avoid the potentially needless commitment of judicial resources to this action, the
26 parties hereby jointly request that this Court stay all proceedings in this action.

27 Plaintiffs BROADCAST MUSIC, INC. ("BMI") filed a complaint in this Court
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1 alleging federal copyright infringement against Defendants G&M Game Corporation, Krazy
2 Koyote, George D. Headley and Marcos Anthony Headley. The parties have settled the
3 matter in principle and entered into a Settlement Agreement and Release (the "Settlement
4 Agreement"). Pursuant to the Settlement Agreement, Defendants are to pay BMI a
5 settlement amount, due and payable over time. An initial settlement payment (the "Initial
6 Settlement Payment") is due and payable no later than February 28, 2008, with the
7 remaining settlement payments due over a 12-month period. The parties have agreed to a
8 Stipulated Consent Judgment, to be submitted to the Court for entry should Defendants
9 default on any one of the subsequent settlement payments.

10 The parties have agreed that, once BMI receives the Initial Settlement Payment and
11 such Payment clears, BMI will dismiss the action, requesting that the Court retain
12 jurisdiction solely for the purpose of entering the Stipulated Consent Judgment, should it be
13 filed.

14 The parties therefore jointly request that the Court enter its order staying all further
15 proceedings in this action, pending BMI's receipt and the clearance of the Initial Settlement

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1 Payment. If the Court wishes to include a provision in the order requiring the periodic filing
2 of a status report, BMI will be pleased to provide any such required reports.

3 DATED: January 30, 2008.

4 Respectfully,

5 KAREN S. FRANK
6 SARAH M. KING
7 HOWARD, RICE, NEMEROVSKI, CANADY,
8 FALK & RABKIN
9 A Professional Corporation

10 By: Karen Frank
11 KAREN S. FRANK

12 Attorneys for Plaintiffs BROADCAST MUSIC,
13 INC. et al.

14 DATED: January 30, 2008.

15 JEFFREY E. ELLIOTT

16 By: Jeffrey E. Elliott
17 JEFFREY E. ELLIOTT

18 Attorneys for Defendants G&M GAME
19 CORPORATION, KRAZY KOYOTE BAR &
20 GRILL, GEORGE D. HEADLEY and MARCOS
21 ANTHONY HEADLEY

22 ~~proposed~~ ORDER STAYING ALL FURTHER PROCEEDINGS:

23 GOOD CAUSE APPEARING, and pursuant to a joint request by all parties for entry
24 of this order, all further proceedings in this action are stayed. Any party may apply for relief
25 from this stay at any time for good cause. [Plaintiff is directed to file with this court and
26 serve upon all other parties to this action a status report every 30 days informing the court
27 of any events relevant to the continuing prosecution of this action.]

28 PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: Feb. 01, 2008

THE HONORABLE
DISTRICT JUDGE

IT IS SO ORDERED

Judge Charles R. Breyer

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JNT. STIP. FOR A STAY OF ALL PROCEEDINGS AND PR

HOWARD
RICE
NEMEROVSKI
CANADY
FALK
& RABKIN
A Professional Corporation

